

1 Pursuant to the Court's March 1, 2019 Order (Dkt. No. 143) and Local Rule 16-10(d), Plaintiffs
 2 Patricia Weeks, Alicia Helms, Brian McCloy, and Adrian Alcaraz, and Defendant Google LLC submit
 3 this subsequent joint case management statement and proposed schedule for briefing settlement approval
 4 under Federal Rule of Civil Procedure 23(e).

5 **1. Case Developments Following Third Case Management Statement**

6 Since the parties filed their last Case Management Statement on December 5, 2018 (Dkt. No.
 7 110), the parties have completed fact discovery in this case. The parties each responded to multiple sets
 8 of interrogatories and document requests. Google produced over 350,000 pages of documents, and
 9 Plaintiffs deposed ten Google employees, including one designated under Rule 30(b)(6) to testify
 10 regarding 17 topics selected by Plaintiffs, and non-party Verizon. Google completed depositions of all
 11 of the named Plaintiffs and also deposed Plaintiffs' experts. On January 23, 2019, Google filed an
 12 Opposition to Plaintiffs' Motion for Class Certification. Dkt. Nos. 130-33.

13 On February 22, 2019, the parties participated in a settlement conference with Magistrate Judge
 14 Donna Ryu. Dkt. No. 117. At the settlement conference, the parties reached an agreement in principle
 15 regarding the monetary terms of a settlement, which the parties confirmed on February 25, 2019. Dkt.
 16 No. 141. In light of the parties' agreement in principle, on March 1, 2019, the Court entered an Order
 17 suspending case deadlines to allow the parties to finalize settlement terms and details. Dkt. No. 143.
 18 Since then, the parties negotiated and, on March 8, executed a term sheet setting forth the material deal
 19 points associated with resolution of this case. The parties will now turn to negotiating and drafting a
 20 final settlement agreement, which will include a plan of allocation and a class notice plan.

21 **2. Proposed Schedule**

22 The parties propose the following schedule for briefing preliminary approval of the proposed
 23 settlement. Plaintiffs will include with their preliminary approval motion a proposed notice plan and
 24 final approval briefing schedule.

Name of Filing or Event	Proposed Deadline
Motion for Preliminary Approval	April 26, 2019
Hearing on Plaintiffs' Motion for Preliminary Approval	May 31, 2019, or as soon thereafter as is convenient for the Court

1 **3. ADR Update**

2 If any disputes arise out of the finalization of the settlement terms and documentation, including
3 the plan of allocation, the parties have agreed that they will present any such disputes to Magistrate
4 Judge Donna Ryu.

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6 Dated: March 13, 2019

Respectfully submitted,

7 By: /s/ Simon S. Grille

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1 Dated: March 13, 2019

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11 *Attorneys for Defendant Google LLC*

12 **ATTESTATION**

13 Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document
14 has been obtained from counsel for Defendant Google LLC.

15 Dated: March 13, 2019

16 /s/ *Simon S. Grille*

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